

**From:** Local Plan Review  
**Subject:** FW: Representations to Mid-Devon Local Plan Review Proposed Submission (incorporating proposed modifications)  
**Attachments:** Representations to Mid-Devon Local Plan Review Proposed Submission (incorporating proposed modifications) 13.2.17.pdf; 16073 L01\_01 Location Plan.pdf

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**From:** Jonathan Chick [REDACTED]  
**Sent:** 13 February 2017 17:26  
**To:** Local Plan Review  
**Subject:** Representations to Mid-Devon Local Plan Review Proposed Submission (incorporating proposed modifications)



**Ian Jewson Planning**

Dear Sir / Madam,

On behalf of our client, Land Value Alliances, please find attached representations in relation to the above consultation.

I would be grateful if you could confirm receipt.

Kind Regards,

**Jonathan Chick**  
Planner

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**Ian Jewson Planning is now part of the Walsingham Planning Group**

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Ian Jewson Planning

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BS1 6UN

Email: [REDACTED] Tel: [REDACTED]

**Our Ref:** N/A  
**Date:** 13<sup>th</sup> February 2017

Local Plan Review Consultation  
Forward Planning  
Mid Devon District Council  
Phoenix House  
Tiverton  
EX16 6PP

Dear Sir/Madam,

**Consultation on the Local Plan Review Proposed Submission (incorporating proposed modifications)**

The following representations have been prepared by Ian Jewson Planning Ltd (IJP) on behalf of Land Value Alliances and relate to the consultation on the Local Plan Review Proposed Submission (incorporating proposed modifications) published in January 2017.

Land Value Alliances (LVA) controls part of the land identified in the proposed submission document at Knowle Lane for residential development (Policy CU13). This allocation has been carried forward from the adopted Core Strategy (Policy AL/CU/8). The majority of the allocation has been granted planning permission for 266 dwellings and our client controls the rest of the allocation.

Through these representations, LVA supports the allocation of the CU13 site for development, however has concerns that the full potential of the site to deliver sustainable residential development to meet growth needs is not being recognised. Further, that the land immediately to the south of the site covering land up to Knowle Lane which is also in our clients control is not being considered as part of this allocation. Apart from being located outside (but adjacent) to the settlement limit for Cullompton this land is not subject to any designations which would seek to restrict development, the land is in a sustainable location providing access onto Knowle Lane, and immediately available to accommodate further residential development. An outline planning application has been submitted for up to 74 dwellings on this land (which partly covers the allocated land in Policy CU13 and the land to the south of this adjacent to Knowle Lane as edged red on the attached plan) under LPA Ref: 16/01988/MOUT. The application is accompanied by a full suite of technical documents which demonstrate that the site is deliverable. It is also within a single ownership and available for development immediately.

Ian Jewson Planning

Our client has concerns that the housing to be delivered under Policy CU13 has been reduced from the 340 units previously established in the adopted Core Strategy (Policy AL/CU/8). With the significant current housing shortage in Cullompton and Mid-Devon District as a whole (the Local Planning Authority accept that it cannot demonstrate a five year land supply of sites which was initially confirmed by an appeal on land West of Harvesters, Uffculme [Ref: APP/Y1138/W/15/3025120]) it is crucial that sites in sustainable locations such as this are developed to their maximum potential. Whilst planning permission has been granted for 266 dwellings in the existing allocation it is still unclear why the total allocation has been reduced to just 296 dwellings overall. The changes represent a significant reduction of 44 dwellings proposed in the allocation.

To make up for this significant loss we consider that the land immediately to the south of the allocation has capacity to deliver the remainder of the original allocation of 340 dwellings which were originally intended in this allocation. Indeed, to boost significantly the supply of housing, Paragraph 47 of the NPPF suggests Local Planning Authorities should:

*“use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;”*

The southern part of the site has been appraised individually within the SHLAA 2014 (New, Larger and Reconsidered Sites) as a site comprising 1.4 hectares with a maximum yield of 56 units (Ref: New Site 4, Acklands). This document confirms that the site is not affected by any significant designations and that the site is developable with a 3 year start date (**see Appendix 1**). However, it was considered that the site was not available for development at the time. These circumstances have now changed with the site immediately available for development. The southern part of the site was also identified as a preferred site for development in an updated SHLAA sites document dated June 2014 (Preferred Sites Working List – Town Sites). This sets out potential policy criteria for the site as a proposed allocation (**see Appendix 2**).

Overall, we consider that the land between the proposed CU13 allocation and Knowle Lane should be included in the allocation for the reasons outlined above.

We note the additional criteria which has been added to Policy CU13 in the Local Plan Review Proposed Submission (incorporating proposed modifications) which requires

*“j) Provision of M5 access improvements before more than 266 dwellings are occupied.”*

Whilst we understand the inclusion of this criteria relates to the current traffic problems in Cullompton and seeks to prevent the occupation of any further residential development in this location until further traffic mitigation is in place to avoid exacerbating this problem, we consider that delivery of a further 74 units will not significantly compromise the existing traffic situation in a town which is expected to accommodate substantial residential development in the District over the plan period.

Indeed, the allocation identified in the adopted Core Strategy (Policy AL/CU/8) was based on traffic modelling which allowed for the delivery of a total of 340 dwellings.

A Transport Statement has been submitted with the outline planning application (16/01988/MOUT) which provides a clear justification for the proposed development and why it is acceptable in transport terms. The Transport Statement concludes:

*“In conclusion, the site is considered to be well located with respect to local facilities and would therefore enable residents to take up the opportunities for sustainable transport. It has also been demonstrated that the proposed development would not result in any severe impacts on the existing highway network. It is therefore considered that the proposed development is acceptable in transport terms and that there should be no highway related reasons to prevent planning permission being granted.”*

We wish to take part in the forthcoming examination and reserve the right to comment further if the issues raised aren't addressed satisfactorily in future versions of the Local Plan Review.

Yours sincerely



**Jonathan Chick BA (Hons) MA (Hons) MRTPI  
Planner**

**Email:** [Redacted]

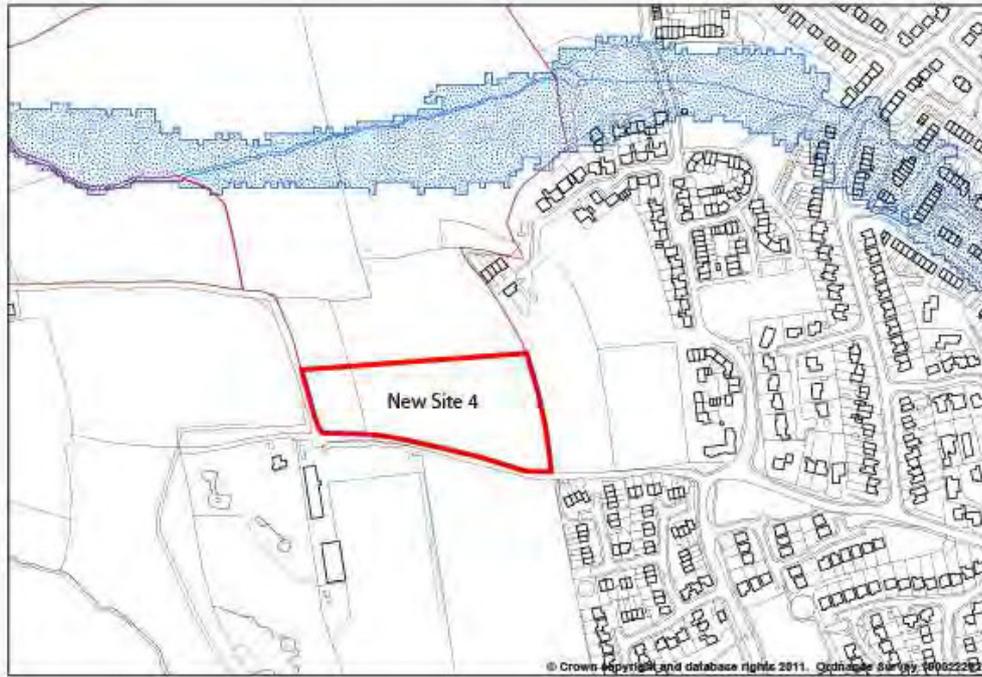
**Mobile:** [Redacted]

## Appendix 1 – Extract from SHLAA 2014 (New, Larger and Reconsidered Sites)

# **Mid Devon SHLAA 2014**

## **New Sites/Larger Sites/Reconsidered Sites**

**Settlement: Cullompton**  
**Site Reference & Name: New Site 4, Acklands**  
**Allocation Reference: N/a**



**Parish: Cullompton**

**Site Area: 1.4**

**Max yield: 56**

**Min yield: 36**

### **Site description**

This site is on the western side of Cullompton and is adjacent to the settlement. This site has the rugby club and pitches to the south, housing to the east and open fields to the north. The area to the north is allocated as part of the 'Knowle Lane' site, of which this site could form an extension. The site is generally flat, with a gentle slope at the northern edge. There are low hedges along the perimeter of the site. It is currently leased to the rugby club who use it as an additional practice area. The promoters have stated that the club no longer wishes to lease the site. They have also stated that development of the site would enable fulfilment of the town council aspiration for widening of Knowle Lane to improve highway safety.

### **Stage A - Site Suitability**

#### **Strategic Policy**

The site lies adjacent to the settlement of Cullompton (but outside the existing settlement limit).

#### **Biodiversity and Heritage**

No European wildlife sites or SSSI designations.

#### **Flood Risk**

Flood zone 1 – no issues to be aware of.

### **Stage B – Environmental Considerations**

#### **Impact on Historic, Cultural and Built Environment**

DCC Archaeology - The site lies in an area of known prehistoric activity. In accordance with the NPPF any planning application for development here should be supported by an appropriate programme of archaeological work to allow the significance of any below-ground heritage assets with an archaeological interest to be understood along with the potential impact of any development upon them. This would allow any mitigation that may be required to be implemented in advance of construction.

#### **Impact on Landscape Character**

This site falls within the 'Lower rolling farmed and settled valley slopes' landscape character area. This area is typified by having a gently rolling and strongly undulating landscape which is intensively farmed. To the north the views are of higher ground. To the east is modern housing, and more is planned for the northern area. The site is likely to be surrounded on three sides by housing development, and therefore any impact is likely to be minimal.

#### **Impact on Biodiversity**

No designations. The site is bounded by hedgerows which can be a haven for wildlife.

### **Minerals Resources**

Not applicable.

### **Air Quality**

Site will have an impact on the Cullompton Air Quality Management Area and will require mitigation.

### **Land Status**

Grade 1 agricultural land.

### **Source Protection Zone**

Not applicable in this location.

### **Stage B – Transport Considerations**

#### **Highway Access**

Current planned junction improvements to Junction 28 will cater for current allocated site and any additional development would provide for concerns over capacity. Suitable linkage to new distributor road would be required and Transport assessment as well as Travel planning is required. No development should be allowed until suitable measures at Junction 28 or other mitigating works can be undertaken to the satisfaction of the Highway Authority and the Highways Agency.

#### **Infrastructure Capacity**

Junction 28 currently suffers from congestion in the peak periods, and new development within Cullompton is likely to add to the pressure already experienced, affecting the ability of the M5 motorway to fulfil its strategic function. There is a Devon led highway improvement scheme to increase capacity and safety at the junction, which has been agreed with by the Highways Agency. This improvement scheme will provide adequate capacity to accommodate traffic likely to be generated by current allocations within the Core Strategy. In order to confirm that the same or further improvement could accommodate traffic from additional development, further analysis will be required. This analysis should consider the effect of the development to be included within the Core Strategy stage and be based on sound evidence.

Where further transport interventions are necessary to accommodate the traffic implications of the Core Strategy then these interventions should be identified at Core Strategy stage. Advice on the preparation of a sound transport evidence base, in so far as the Agency is concerned, is set out in the attached note. Further information can also be found in DfT Circular 02/2013 'The SRN and the delivery of sustainable development'.

#### **Access to Public Transport**

Suitable bus services are within walking distances.

## **Stage B – Social or Other Considerations**

### **Access to services/facilities**

Cullompton has a wide range of services and facilities. As the crow flies the minimum distance to the town centre would be approx.. 900m. Actual walking or driving distances would be greater however.

### **Constraints to Delivery**

None.

### **Open Space and Recreation**

The site is agricultural land, but is used informally by the adjacent rugby club as practice space. However, it is understood that the rugby club will not be renewing the lease which expires in June 2014.

### **Loss of Employment Land**

No loss.

### **Education infrastructure**

Primary schools are at capacity and are both located on constrained sites making expansion either difficult or proportionally expensive. New school provision will be required early in the development. The secondary school is forecast to have capacity but may require additional infrastructure later in the planning period including land. There is a shortage of early years provision in the town which will be exacerbated but further development.

### **Compatibility and density**

No compatibility concerns. Adjacent housing is medium density.

### **Site Availability**

**Is the site immediately available for development?**

**No (currently under lease)**

**Soonest date available (if currently unavailable):**

**June 2014**

**Is it currently being marketed:**

**Already in control of land promoter**

**Landowners estimated development time:**

**Not stated**

**Appendix 2 – Extract from SHLAA 2014 (Preferred Sites Working List – Town Sites)**



# **Strategic Housing Land Availability Assessment**

**Sites for consideration by the Panel**

**Initial Preferred Sites Working List**

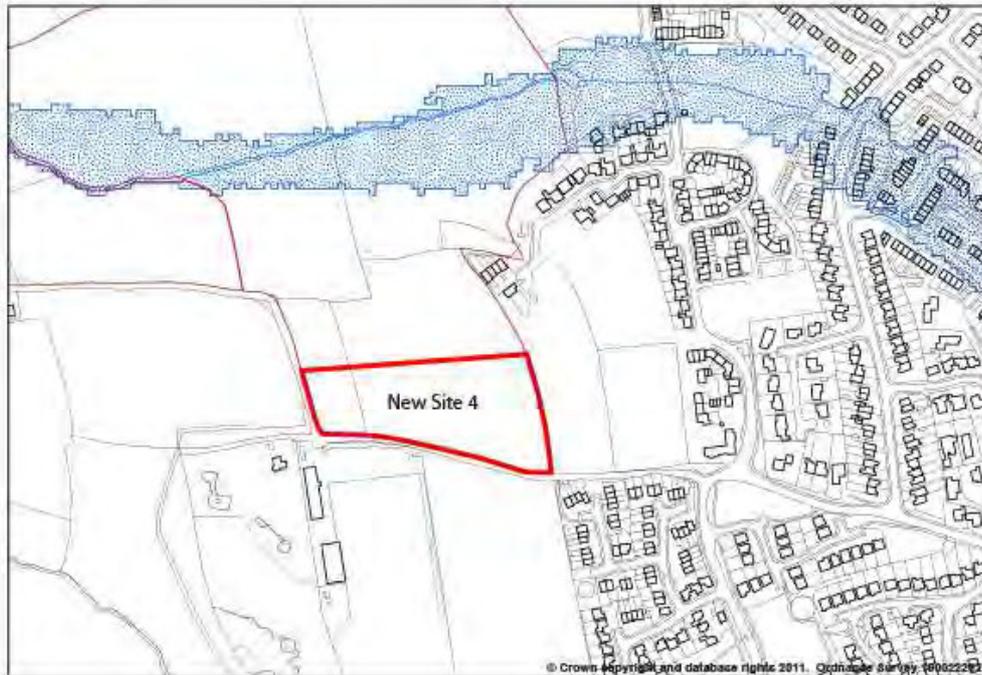
**(Town sites)**

**June 2014**

**Settlement: Cullompton**

**Site Reference & Name: New Site 4, Acklands**

**Allocation Reference: N/a**



## **2014 Proposed Site Allocation – Potential Policy Criteria**

- **Site area 1.4ha**
- **34 dwellings**
- **20-25% affordable housing**
- **Not to come forward until the road through the North West Cullompton allocation has been delivered**
- **Archaeological investigation and mitigation**

Notes: This site was considered by the SHLAA panel in 2014 and was considered to be deliverable with a year 3 start.

## **2014 SHLAA Site Appraisal**

**Parish: Cullompton**

**Site Area: 1.4**

**Max yield: 56**

**Min yield: 36**

### **Site description**

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### **Stage A - Site Suitability**

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#### **Biodiversity and Heritage**

No European wildlife sites or SSSI designations.

#### **Flood Risk**

Flood zone 1.

### **Stage B – Environmental Considerations**

#### **Impact on Historic, Cultural and Built Environment**

DCC Archaeology - The site lies in an area of known prehistoric activity. In accordance with the NPPF any planning application for development here should be supported by an appropriate programme of archaeological work to allow the significance of any below-ground heritage assets with an archaeological interest to be understood along with the potential impact of any

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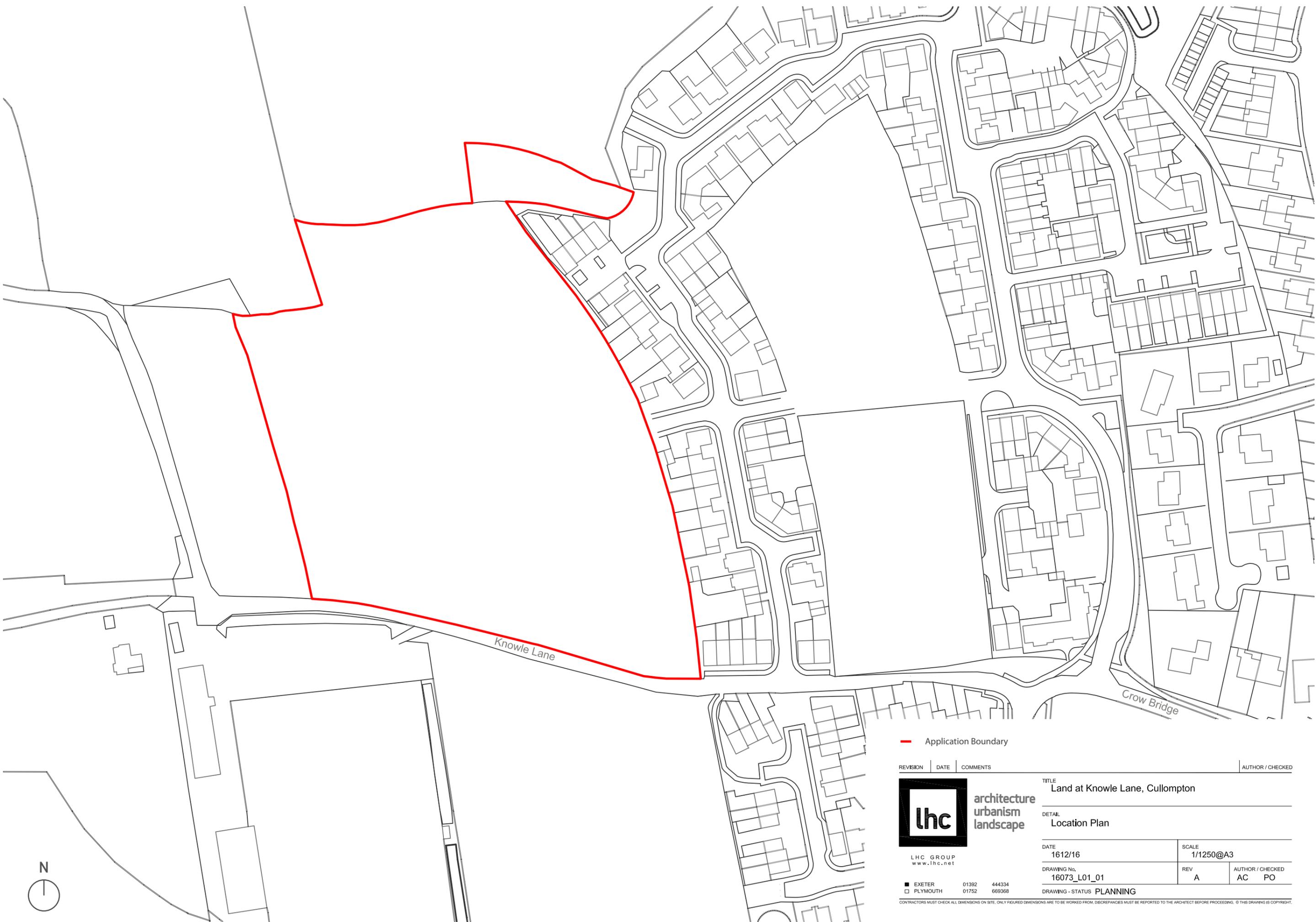
**June 2014**

**Is it currently being marketed:**

**Already in control of land promoter**

**Landowners estimated development time:**

**Not stated**



— Application Boundary

REVISION	DATE	COMMENTS	AUTHOR / CHECKED
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LHC GROUP  
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architecture  
urbanism  
landscape

TITLE  
Land at Knowle Lane, Cullompton

DETAIL  
Location Plan

DATE  
1612/16

SCALE  
1/1250@A3

DRAWING No.  
16073\_L01\_01

REV A	AUTHOR / CHECKED AC PO
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■ EXETER 01392 444334  
□ PLYMOUTH 01752 669368

DRAWING - STATUS PLANNING

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